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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

**NIGHT BOX
FILED**

JUN 01 2001

CLARENCE MADDOX
CLERK, USDC / SDFL / MIA

HENRY NARANJO and
MARLENE RAMIREZ,

CASE NO. 00-6022-CIV-LENARD
Magistrate Judge Turnoff

Plaintiffs,

v.

STEPHEN BYRON SMITH, and
PALMER JOHNSON, INC.,

Defendants.

DEFENDANT'S EXPERT WITNESS DISCLOSURE

COMES NOW the Defendant, PALMER JOHNSON, INC., by and through undersigned counsel, and pursuant to the Court's Trial Order, and files this its Expert Witness Disclosure:

- 1) Dave Jones
D. E. Jones & Associates, Inc.
607 Apalachee Circle, NE
St. Petersburg, Florida 33702

Mr. Jones is expected to testify that the vessel was designed pursuant to the applicable design standards of Naval Architecture.

- 2) Lee Swanger, Ph.D. and/or Dave Wills, Ph.D.
ExPonent/Failure Analysis
4101 Southwest 71st Avenue
Miami, Florida 33155

Dr. Swanger and/or Dr. Wills are expected to testify that the vessel *Souvenir* conformed to the applicable engineering and manufacturing standards.

- 3) Manfred H. Ledford, Ph.D.
Department of Finance
University of Miami

P.O. Box 248094
Coral Gables, Florida 33124

Dr. Ledford is expected to testify regarding the Plaintiffs' economic losses as a result of the incident.

- 4) Theodore S. Bilski, C.D.M.S., M.B.A.
708 Kingston Court
Apollo Beach, FL 33572

OR

Raqueline Fals, C.R.C.
IRG/Seltzer Delman
1300 Sawgrass Corporate Parkway, Suite 130
Sunrise, FL 33323

Mr. Bilski or Ms. Fals is expected to testify concerning the Plaintiffs' vocational potential and present/future earning capacity. (Mr. Bilski's health will determine whether his is our primary witness in this area of expertise).

- 5) Jay Stein, M.D.
9699 NE 2nd Avenue
Miami Shores, Florida 33138
IME Orthopedist

Dr. Stein is expected to testify concerning the Plaintiffs' Orthopedic condition.

- 6) Carlos Diaz-Silveria, M.D.
Mercy Professional Building
3661 South Miami Avenue
Suite 903
Miami, Florida 33133
IME Psychiatrist

Dr. Diaz-Silveria is expected to testify concerning the Plaintiffs' psychological and psychiatric condition.

- 7) Alan M. Wagshul, M.D.
7330 SW 62nd Place
Suite 310
South Miami, Florida 33143
IME Neurologist

Dr. Wagshul is expected to testify concerning the Plaintiffs' neurological condition.

- 8) Guillermo Pasarin, M.D.
4900 West Oakland Park Blvd., Suite 105
Fort Lauderdale, Florida 33313

Dr. Pasarin is expected to testify concerning the Plaintiffs' surgical residuals and condition, and whether any future neurosurgery may be necessary.

- 9) Bryce Epstein, M.D.
21000 NE 28th Avenue
Suite 104
Aventura, FL 33180

Dr. Epstein is expected to testify concerning the Plaintiff's physical condition based from a psychiatrist's point of view.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing motion has been furnished by mail this 1st day of **June, 2001** to: **Manuel Valdes, Esquire**, Law Offices of Manuel Valdes, Attorneys for Plaintiffs, 910 Madrid Street, Coral Gables, Florida 33134; **F. David Famulari, Esquire**, Co-Counsel for Plaintiffs, Blanck & Perry, P.A., 5730 SW 74th St., Suite 700, Miami, FL 33143; **John D. Kallen, Esquire**, Badiak, Will & Kallen, Attorneys for Stephen Byron Smith, 17071 West Dixie Highway, North Miami Beach, Florida 33160; and David L. Weber, Esquire, Pinkert Law Firm LLP, 454 Kentucky Street, P.O. Box 89, Sturgeon Bay, WI 54235-0089.

VALLE & CRAIG, P.A.

Co-Counsel for Defendant,

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By: 

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